



**Office of Radiological,
Nuclear, and Process Safety Regulation
of TWRS Privatization Contractors**

Richland Operations Office, MS A4-70, PO Box 550, Richland, WA 99352
Phone (509) 376-4132 Fax (509) 376-3661

**TWRS
Regulatory
Unit**

Meeting Record

IMS#: 99-RU-0073

MTG PURPOSE: The meeting was held to discuss the draft outline for the Construction Authorization Request (CAR) Review Guidance Document. A proposed change to Chapter 4.0 "Preliminary Safety Analysis," formally called "Integrated Safety Analysis," was also discussed.

MTG DATE/TIME: December 1, 1998, 8:00 a.m.

MTG PLACE: Room 147, Federal Building

AGENDA: Not Published

ATTENDANCE: RU: Lew Miller, George Kalman, Jay Boudreau, Ron Lerch
BNFL: Dennis Klein, Al Hosler

PREPARED BY: Ron Lerch

CONCURRENCE: Lew Miller

MEETING MINUTES:

A meeting was held between BNFL and the Regulatory Unit (RU) regarding the CAR Review Guidance Document. An outline of the Review Guidance Document as currently planned was shared with BNFL. This outline is based on BNFL's earlier submittal of the "*Initial Safety Analysis Report*" (BNFL-5193-ISAR-01, Rev. 0) as well as USNRC documents "*Standard Review Plan for the Review of a License Application for Fuel Cycle Facilities*" (NUREG-1520) and "*Standard Format and Content for the Health and Safety Sections of License Applications for Fuel Cycle Facilities*" (Regulatory Guide 3.52). A write-up proposing a change to Chapter 4.0 "Preliminary Safety Analysis" was also shared with BNFL as was a cross-walk between the current outline to Chapter 4.0 and the proposed outline for Chapter 4.0.



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The bases for both outlines was discussed. The proposed change to Chapter 4.0 "Preliminary Safety Analysis," is designed to better address the specific criteria from DOE/RL-96-0003 "*DOE Regulatory Process for Radiological, Nuclear, and Process Safety for TWRS Privatization Contractors*" necessary for approval of the CAR. In particular, the following three criteria are addressed:

- An analysis of the safety basis for the facility (safety envelope) (Section 4.7 of proposed outline)
- A demonstration that the facility should perform such that the radiological, nuclear, and process safety requirements in the SRD and in applicable regulations should be met (Section 4.8 of proposed outline)
- A demonstration that adequate protection of the public, the workers, and the environment should be achieved (Section 4.9 of proposed outline)

BNFL agreed that they should address the first criterion (Section 4.7) rather than leave that question to the RU. BNFL suggested that the other two criteria (Sections 4.8 and 4.9) appeared to be redundant with the first criterion and suggested that the RU consider consolidating these sections. In addition, Section 4.8 appears to overlap another submittal requirement, namely "an assessment of compliance to the Safety Requirements Document (SRD) and the Integrated Safety Management Plan (ISMP)." Meeting participants agreed that both the RU and BNFL would review the proposed outline to Chapter 4.0 "Preliminary Safety Analysis" and meet again to finalize the outline for the chapter.

BNFL asked if the changes to the "J-Documents" had been approved and issued. The RU stated that they thought the documents had been approved and that the changes were the basis of the outline for the CAR Review Guidance Document. The RU would confirm whether the J-Documents had been approved. (Note: After the meeting, the RU found out that the latest versions of the J-Documents were still awaiting approval by DOE-HQ.)

The subject of BNFL's plans for resubmitting their "*Hazards Analysis Report*" (BNFL-5193-HAR-01, Rev. 0) was also discussed. The RU asked BNFL to explain the distinction between the Hazards Analysis Report (HAR) and the Preliminary Safety Analysis (PSA). BNFL stated that the HAR was intended to describe all hazards and potential hazard control approaches, whereas the PSA draws upon the HAR to define Design Basis Events, supported by more detailed analysis in order to define important-to-safety Structures, Systems and Components (SSCs). The revised HAR submittal is planned for August 2000. The CAR is scheduled for submittal in November 2000, approximately 14 weeks after the HAR submittal.



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Information Exchanged:

The following documents were exchanged (see attachments):

1. Revised Draft Outline – “Guidance for the Review of TWRS Privatization Contractor Construction Authorization Request” dated December 1, 1998.
2. Revised Outline for CAR Review Guidance Chapter 4.0.
3. Comparison of Outlines for Chapter 4.0 of Construction Authorization Request.

Actions:

Both the RU and BNFL will review the revised outline for Chapter 4.0 (handout 2), then meet again to finalize the outline for that chapter. BNFL will also review the overall outline for the CAR Review Guidance Document (handout 1) and provide comments back to the RU.

Attachments:

1. Revised Draft Outline – “Guidance for the Review of TWRS Privatization Contractor Construction Authorization Request” dated December 1, 1998.
2. Revised Outline for CAR Review Guidance Chapter 4.0.
3. Comparison of Outlines for Chapter 4.0 of Construction Authorization Request.